

REMARKS

Applicants acknowledge receipt of the Examiner's Office Action dated September 19, 2007. Claims 4-8, 12-16, and 24-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rappoport, U.S. Patent No. 6,828,963 (Rappoport). In light of the foregoing amendments and following remarks, Applicants respectfully request the Examiner's reconsideration and reexamination of all pending claims.

As noted, the Office Action rejected all claims as being unpatentable over Rappoport. Dependent claims 25 and 27, prior to cancellation hererin, further limited independent claims 24 and 26, respectively, by either creating a new product record or updating an existing product management record in the target computerized product management system. In rejecting these dependent claims, the Office Action asserts Rappoport teaches the act of updating an existing product management record in the target computerized product system citing column 5, lines 36-46 in support thereof.

Applicants respectfully disagree. The cited section of Rappoport recites:

An underlying objective in the data exchange techniques described herein is that the design intent from the source CAD model should be preserved. What this means in practice is that the resultant CAD data structure for the target computer system preserves the ability of a subsequent engineer to manipulate, on a feature by feature basis, the target CAD data structure—just as if the engineer were operating on the source CAD data structure. Of course, this level of manipulation will not always be possible, and indeed it is not even a necessary requirement of the invention, but it is preferred nonetheless.

Here Rappoport describes how an engineer can update a CAD data structure on a target CAD machine using the same target CAD machine. The cited section does not teach or fairly suggest updating an existing CAD data structure on the target CAD machine using a converted CAD data structure that was on a source CAD machine (i.e., after it has gone through the extraction and creation process described within Rappoport). Thus, the cited section of Rappoport does not teach or fairly suggest “updating an existing product management record in the target computerized product management system using the product management information in the target form, even assuming that the claimed existing product management record corresponds to existing CAD data structure in the target CAD machine of Rappoport. Accordingly, Applicants assert that independent claims 24 and 26, and those claims dependent therefrom, are patentably distinguishable over the cited sections of Rappoport.

As noted above, Applicants have added new claim 28. This claim recites converting the product management information in the second intermediate form into product management information in a first target form and product management information in a second target form. Applicants have reviewed Rappoport and cannot find any teaching or fair suggestion of this limitation either alone or in combination with the remaining limitations of independent claim 28. Applicants note that column 9, lines 15-27 of Rappoport describes a bridge data structure 402' that can be a universal file format that is itself converted by the target CAD system 403 to a native format. Such a universal file format has the advantage of removing the extraction stage 406 in subsequent CAD data exchange processes – leaving only the creation stage 407 when more than one type of target CAD system 403 will be using the CAD model taken from the source CAD system 401. This cited section of Rappoport does not *necessarily* teach

or fairly suggest converting the product information in the second intermediate form into product management system in a first target form and product information in a second target form. In support thereof, Applicants note that the cited section of Rappoport talks about reading a bridge structure 402' in conjunction with more than one type of targeting CAD system 403. This, however, does not suggest or teach that the formats of bridge data structure 402' will result in target CAD models of distinct formats. Two different CAD systems of different types can operate data in the same format.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5093.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,



Eric A. Stephenson
Attorney for Applicants
Reg. No. 38,321
Telephone: (512) 439-5093
Facsimile: (512) 439-5099